

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE

JEREMIAH WALDROP, ET AL.,]	
]	
Plaintiffs,]	
]	
v.]	No. 2:19-cv-00103-JRG-CRW
]	JURY DEMAND
CITY OF JOHNSON CITY, TENNESSEE;]	
ET AL.,]	
]	
Defendants.]	

**MOTION OF JOHNSON CITY, TENNESSEE FOR
PROTECTIVE ORDER REGARDING RULE 30(b)(6) DEPOSITION**

Comes the defendant, Johnson City, Tennessee (“Johnson City”) and moves the Court for an Order prohibiting the asking of certain questions or limiting the scope of certain questions during the 30(b)(6) deposition of Brian Rice. This Motion is supported by a Memorandum Brief and the Declaration of K. Erickson Herrin. This Motion is also supported by the Rule 30(b)(6) Notice issued to Johnson City by the plaintiffs and the Rule 30(b)(6) deposition transcript of Captain Brian Rice taken on June 26, 2020, and adjourned during the deposition.

Prior to filing this Motion, undersigned counsel certify that they attempted in good faith to confer with plaintiffs’ counsel regarding the disputes set forth in the supporting Memorandum Brief.

Respectfully submitted,

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